

2 Dec 2021

My Name is TSgt Tyler J. Whitney. I was the Medical Group Executive Officer from 1 December 2020 until 1 November 2021 in the United States Air Force (USAF) stationed at the 22nd Medical Group (MDG), McConnell AFB, Kansas, and was responsible for all official communication to & from our medical clinic with the 22nd McConnell base tenants, the Air Force Medical Services, and the Defense Health Agency, as well as coordinating all COVID-19 vaccine meeting with all executive medical staff within the 22nd MDG. There is no Comirnaty COVID-19 vaccines available in the 22nd MDG Military Treatment Facility (MTF) and can confirm that the Comirnaty COVID-19 vaccine has never been available at our clinic, as of 19 November 2021, as the attached pictures show from the Defense Medical Logistics Standard Support (DMLSS), which is the system utilized for purchasing all medical supplies. The only COVID-19 vaccines that have been purchased/utilized within our MTF are the COVID-19 Emergency Use Authorization (EUA) vaccines (Pfizer/BioNTech and Moderna), as shown again in the DMLSS picture. The system allows a user to search items available within the MTF, as well as any items that have ever been inputted for purchase from any other base that utilizes the system.

I can confirm that there are currently no licensed product with the name of "Comirnaty" that have ever been available at the 22nd MDG on McConnell AFB, nor has any product with the name "Comirnaty" ever been available for purchase within the entire DMLSS system, as of 19 November 2021.

Additionally, our MTF received direction from the Acting Secretary of Defense (signed on 14 September 2021) stating that, *"DoD health care providers will use both the Pfizer-BioNTech COVID-19 vaccine and the Comirnaty COVID-19 vaccine interchangeably for the purpose of vaccinating Service members in accordance with Secretary of Defense Memorandum, "Mandatory Coronavirus Disease 2019 Vaccination of Department of Defense Service Members," August 24, 2021"* (see attachment). The 22nd MDG was then directed to utilize this Fact sheet (see attachment; revised on 22 September) to show any service members who questioned the legality of being required to receive the Pfizer BioNTech EUA COVID-19 vaccines, in lieu of the Comirnaty vaccine, which was never available. This Fact sheet was distributed to all base commanders, available at all COVID-19 vaccine events, and available upon request within the MTF for any Airmen who had reservations or question about being required to receive the Pfizer/BioNTech COVID-19 vaccine. I can confirm that this Fact sheet was utilized on numerous occasions to educate objecting service members that the USAF was authorized to utilize EUA Pfizer/BioNTech COVID-19 vaccines interchangeably with the Comirnaty COVID-19 vaccine, since the 22nd MDG did not have any Comirnaty COVID-19 vaccines ever available.

This is true to the best of my knowledge and belief.

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Attachments:
DMLSS EUA
DMLSS
SECDEF
Fact Sheet

DMLSS/CAIM - 355511/DENTAL CLINIC - [Catalog Search]

File Edit Data Navigate Utilities Window Help

Cat Search SOS Phys. Inv... Manu. R... Batch HHT BarCode BPS Order Due-In/O... Receipts Reports Trans His... Check Fu...

Basic Search Advanced Search Categorical Search Search Result Detail

Search By

Number: ☐ Starts With

Description: COVID-19 VACCINE

Filter By

Pricing Agreement:

Scope

☐ Contracted Items

☐ Sourced Items

☐ Unsourced Items

☐ Readiness Portal

☒ MTF Catalog

☐ LOG Catalog

☐ Customer Catalog

Active ☒ Deleted ☐

Short Item Description	Item ID	SOS	U/P	U/P Qty	U/P Price	U/M Price	LUM	Manufacturer	Manufacturer Catalog Number	NSN	NDC	GTIN
MODERNA COVID-19 VACCINE (EUA) 5ML	6505016925286	ECG	EA	1	.01	.0100	N	MODERNA		6505016925286	80777027310	
MODERNA COVID-19 VACCINE (EUA) 5ML	6505016925286	SMS	EA	1	.01	.0100	Y	MODERNA		6505016925286	80777027310	
PFIZER COVID-19 VACCINE (EUA) 1.8ML	6505016924173	ECG	VI	1	.01	.0100	N	PFIZER			59267100001	
PFIZER COVID-19 VACCINE (EUA) 1.8ML	6505016924173	F04	VI	1	.01	.0100	N	PFIZER			59267100001	
PFIZER COVID-19 VACCINE (EUA) 1.8ML	6505016924173	SMS	VI	1	.01	.0100	N	PFIZER			59267100001	

Records 1 to 5 of 5

Search all text description fields

Limit: 500

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DMLSS/CAIM - 355511/DENTAL CLINIC - [Catalog Search]

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Cat Search SOS Phys. Inv... Manu. R... Batch HHT BarCode BPS Order Due-In/O... Receipts Reports Trans His... Check Fu...

Basic Search Advanced Search Categorical Search Search Result Detail

Search By

Number: ☐ Starts With

Description: COMIRNATY

Filter By

Pricing Agreement:

Scope

☐ Contracted Items

☐ Sourced Items

☐ Unsourced Items

☐ Readiness Portal

☒ MTF Catalog

☐ LOG Catalog

☐ Customer Catalog

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Short Item Description Item ID SOS U/P U/P Qty U/P Manufacturer Manufacturer Catalog Number NSN

DMLSS/CAIM

No records found.

OK

Limit: 500

Ready

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ASSISTANT SECRETARY OF DEFENSE

**1200 DEFENSE PENTAGON
WASHINGTON, DC 20301-1200**

HEALTH AFFAIRS

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY (MANPOWER AND
RESERVE AFFAIRS)
ASSISTANT SECRETARY OF THE NAVY (MANPOWER AND
RESERVE AFFAIRS)
ASSISTANT SECRETARY OF THE AIR FORCE (MANPOWER
AND RESERVE AFFAIRS)
DIRECTOR, DEFENSE HEALTH AGENCY

SUBJECT: Mandatory Vaccination of Service Members using the Pfizer-BioNTech COVID-19
and Comirnaty COVID-19 Vaccines

On August 23, 2021, the U.S. Food and Drug Administration (FDA) approved the biologics license application for the Comirnaty vaccine, made by Pfizer-BioNTech, as a two-dose series for prevention of coronavirus disease 2019 (COVID-19) in persons aged 16 years or older. Previously, on December 11, 2020, the FDA issued an Emergency Use Authorization (EUA) for the Pfizer-BioNTech COVID-19 vaccine, which has the same formulation as the Comirnaty vaccine. Per FDA guidance, these two vaccines are “interchangeable” and DoD health care providers should “use doses distributed under the EUA to administer the vaccination series as if the doses were the licensed vaccine.”¹

Consistent with FDA guidance, DoD health care providers will use both the Pfizer-BioNTech COVID-19 vaccine and the Comirnaty COVID-19 vaccine interchangeably for the purpose of vaccinating Service members in accordance with Secretary of Defense Memorandum, “Mandatory Coronavirus Disease 2019 Vaccination of Department of Defense Service Members,” August 24, 2021.

My point of contact for this guidance is Colonel Michael J. Berecz, who may be reached at (703) 681-8463 or michael.j.berecz.mil@mail.mil.

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Terry Adirim, M.D., M.P.H., M.B.A.
Acting

cc:
Surgeon General of the Army
Surgeon General of the Navy
Surgeon General of the Air Force
Joint Staff Surgeon

¹ FDA, “Q&A for Comirnaty (COVID-19 Vaccine mRNA),” <https://www.fda.gov/vaccines-blood-biologics/qa-comirnaty-covid-19-vaccine-mrna>, accessed September 10, 2021.

**VACCINE INFORMATION FACT SHEET FOR RECIPIENTS AND CAREGIVERS
ABOUT COMIRNATY (COVID-19 VACCINE, mRNA)
AND PFIZER-BIONTECH COVID-19 VACCINE TO PREVENT CORONAVIRUS
DISEASE 2019 (COVID-19)**

You are being offered either COMIRNATY (COVID-19 Vaccine, mRNA) or the Pfizer-BioNTech COVID-19 Vaccine to prevent Coronavirus Disease 2019 (COVID-19) caused by SARS-CoV-2.

This Vaccine Information Fact Sheet for Recipients and Caregivers comprises the Fact Sheet for the authorized Pfizer-BioNTech COVID-19 Vaccine and also includes information about the FDA-licensed vaccine, COMIRNATY (COVID-19 Vaccine, mRNA).

The FDA-approved COMIRNATY (COVID-19 Vaccine, mRNA) and the FDA-authorized Pfizer-BioNTech COVID-19 Vaccine under Emergency Use Authorization (EUA) have the same formulation and can be used interchangeably to provide the COVID-19 vaccination series.^[1]

COMIRNATY (COVID-19 Vaccine, mRNA) is an FDA-approved COVID-19 vaccine made by Pfizer for BioNTech. It is approved as a 2-dose series for prevention of COVID-19 in individuals 16 years of age and older. It is also authorized under EUA to provide:

- **a two-dose primary series in individuals 12 through 15 years;**
- **a third primary series dose in individuals 12 years of age and older who have been determined to have certain kinds of immunocompromise; and**
- **a single booster dose in individuals:**
 - **65 years of age and older**
 - **18 through 64 years of age at high risk of severe COVID-19**
 - **18 through 64 years of age whose frequent institutional or occupational exposure to SARS-CoV-2 puts them at high risk of serious complications of COVID-19 including severe COVID-19**

The Pfizer-BioNTech COVID-19 Vaccine has received EUA from FDA to provide:

- **a two-dose primary series in individuals 12 years of age and older;**
- **a third primary series dose for individuals 12 years of age and older who have been determined to have certain kinds of immunocompromise; and**
- **a single booster dose in individuals:**
 - **65 years of age and older**

^[1] The licensed vaccine has the same formulation as the EUA-authorized vaccine and the products can be used interchangeably to provide the vaccination series without presenting any safety or effectiveness concerns. The products are legally distinct with certain differences that do not impact safety or effectiveness.